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December 20, 2024

Granted.



December 23, 2024

BY ECF AND BY HAND

Honorable Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl Street, Room 1910
New York, NY 10007

RE: Skillz Platform Inc. v. Papaya Gaming, Ltd., et al., No. 1:24-cv-01646-DLC (S.D.N.Y.)

Dear Judge Cote:

Pursuant to Rule 8.B of Your Honor's Individual Practices, we write on behalf of Defendant and Counterclaim-Plaintiff Papaya Gaming, Ltd. ("Papaya") concerning Papaya's December 20, 2024 Letter Motion requesting a discovery conference to address the refusal of Skillz Platform Inc. ("Skillz") to produce relevant discovery.

Skillz has taken the position that "[c]ertain information related to matchmaking practices on Skillz's mobile gaming platform constitutes confidential trade secrets and must be filed under seal." ECF No. 108. The Court has authorized Skillz to file such information under seal. *See* ECF No. 111. Papaya's Letter Motion and its Exhibits contain references to these "trade secrets." Moreover, Papaya's Letter Motion and Exhibits consist of, and/or refer to, December 5 deposition testimony from a former Skillz employee that must be treated as Highly Confidential-Outside Counsel's Eyes Only Material for thirty (30) days under the Protective Order (*see* ECF No. 39, § IV.B(b)).

Accordingly, Papaya seeks leave to file its Letter Motion under seal in redacted form, and to file the Exhibits to that Letter Motion under seal in their entirety.

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Respectfully submitted,

/s/ Anthony J. Dreyer

Anthony J. Dreyer

Cc: Counsel of record (by ECF)